

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT
UNION, on behalf of itself and its members,**

Plaintiff,

vs.

Case No. 2:19-cv-00624-RJC

**FISERV SOLUTIONS, LLC, f/k/a FISERV
SOLUTIONS, INC., and FISERV, INC.,**

Defendants.

**DECLARATION OF BENJAMIN WILKINSON
IN SUPPORT OF BESSEMER’S OBJECTIONS TO SPECIAL MASTER REPORT AND
RECOMMENDATION**

Benjamin Wilkinson, declares under penalties of perjury:

1. I am a partner at Barclay Damon LLP and counsel to plaintiff Bessemer System Federal Credit Union (“Bessemer”).
2. This Declaration is submitted in further support of Bessemer’s Objections to the Special Master’s Report and Recommendation (“R&R”) and pursuant to Paragraph 16 of the Order Appointing Discovery Special Master (Dkt. 195), which requires the objecting party to provide the Court with the record necessary to review the R&R.
3. **Exhibit A** hereto is a true and correct copy of Bessemer’s letter to the Special Master regarding the scope of discovery dated July 22, 2022.
4. **Exhibit B** hereto is a true and correct copy of Fiserv’s’ letter to the Special Master regarding the scope of discovery dated July 22, 2022.

5. **Exhibit C** hereto is a true and correct copy of Bessemer's supplemental letter brief dated March 22, 2023 regarding the appropriate scope of discovery and the pending discovery motions.

6. **Exhibit D** hereto is a true and correct copy of Fiserv's supplemental letter brief dated March 22, 2023 regarding the appropriate scope of discovery and the pending discovery motions.

7. **Exhibit E** hereto is a true and correct copy of an email from Fiserv's counsel dated May 16, 2023 submitting a copy of the PowerPoint presentation utilized during the May 16, 2023 oral argument and a true and correct copy of the presentation.

8. **Exhibit F** hereto is a true and correct copy of Bessemer's post-hearing submission dated May 18, 2023.

9. **Exhibit G** hereto is a true and correct copy of Fiserv's post-hearing response to Bessemer's submission dated May 19, 2023.

10. **Exhibit H** hereto is a true and correct copy of Bessemer's email response to Fiserv's letter dated May 19, 2023.

Dated: July 3, 2023

/s/ Benjamin Wilkinson
Benjamin Wilkinson